

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	Criminal No. 05-30057-MAP
)	
V.)	
)	
)	
NAOMI WATFORD,)	
Defendant)	

ASSENTED-TO MOTION FOR TEMPORARY CHANGE
IN CONDITIONS OF RELEASE

Defendant Naomi Watford, with the assent of the government, respectfully requests that her conditions of release be changed in order to allow Ms. Watford to leave Massachusetts for seven (7) days, beginning March 28 and ending April 3, 2007 in order for her to travel to Miami, Florida. In support thereof, Ms. Watford states:

1. Ms. Watford is scheduled to self-report to BOP on May 4, 2007 to begin a three year sentence of imprisonment. Ms. Watford is presently living at home and is in compliance with all conditions of release.
2. If the motion is allowed, Ms. Watford will contact U.S. Pretrial Services before she departs on her trip and ascertain what contact she should have with U.S. Pretrial Services while she is away from home.

3. U.S. Pretrial Services is aware that Ms. Watford is making this motion.
4. A.U.S.A. Kevin O'Regan has assented to this motion.

WHEREFORE, Naomi Watford requests that the court allow this temporary change in her travel restrictions, with any special reporting or other conditions as Pretrial Services may set, and with all other terms and conditions to remain in effect.

RESPECTFULLY,
NAOMI WATFORD, By Her Attorney,

s/ Myles Jacobson

Date: March 5, 2007

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